UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE APPLICATION OF TOP ZINC LIMITED AND ZINC HOTELS (INVESTMENT) LIMITED FOR AN ORDER TO TAKE DISCOVERY FOR USE IN FOREIGN PROCEEDINGS PURSUANT TO 28 U.S.C. §1782 No.: 1:18-MC-00169

RULE 7.1 DISCLOSURE STATEMENT

Pursuant to Federal Rule of Civil Procedure 7.1 and to enable District Judges and Magistrate Judges of the Court to evaluate possible disqualification or recusal, the undersigned counsel for Applicants Top Zinc Limited and Zinc Hotels (Investment) Limited (private non-governmental parties) certifies that Top Zinc Limited is the parent company of Zinc Hotels (Investment) Limited. No publicly held company owns 10% or more of Top Zinc Limited's stock.

Dated: April 26, 2018 Respectfully submitted,

SCOTT+SCOTT ATTORNEYS AT LAW LLP

/s/ David R. Scott

DAVID R. SCOTT SYLVIA M. SOKOL RANDY MOONAN ANJALI BHAT The Helmsley Building 230 Park Avenue, 17th Floor New York, NY 10169 Telephone: 212-223-6444 Facsimile: 212-223-6334

Facsimile: 212-223-6334 david.scott@scott-scott.com ssokol@scott-scott.com rmoonan@scott-scott.com abhat@scott-scott.com